

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID SIDOO et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S ASSENTED-TO MOTION FOR LEAVE
TO FILE SEALED SUR-REPLY (TO USC'S MOTION TO QUASH)**

The University of Southern California is moving to quash two pretrial subpoenas that defendant John Wilson sought and obtained in ex parte proceedings. ECF No. 1357. In its reply brief, USC has included numerous misstatements that distort the facts and muddy the issues. Wilson therefore moves for leave to file a short sur-reply correcting a small number of those misstatements.

The Court has permitted prior filings connected to the Motion to be filed under seal, in order to continue to preserve the confidentiality of Wilson's defense strategy and work product. *See United States v. Diamont*, No. 05-cr-10154 (D. Mass. Nov. 22, 2005). Wilson therefore seeks leave to file his sur-reply brief under seal as well, with a copy served on USC by email.

USC assents to these requests.

Respectfully submitted:

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/s/ Michael Kendall

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CERTIFICATE OF SERVICE

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/s/ Michael Kendall

Michael Kendall